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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11

12 Plaintiff,

13 v.

14 ERIK ROJO,

15 Defendant.

Case No. 2:15-cr-00180-RFB

**STIPULATION TO CONTINUE  
REVOCATION HEARING**  
(First Request)

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and Justin J. Washburne, Assistant United States Attorney, counsel for  
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and Rick Mula,  
20 Assistant Federal Public Defender, counsel for Erik Rojo, that the Revocation Hearing currently  
21 scheduled on August 22, 2024, be vacated and continued to a date and time convenient to the  
22 Court, but no sooner than four (4) months.

23 This Stipulation is entered into for the following reasons:

24 1. United States Probation Officer Cecil McCarroll executed a Petition for  
25 Summons for Offender Under Supervision on March 11, 2024. (ECF No. 124.)  
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1           2.       Mr. Rojo made an initial appearance (at liberty) on March 28, 2024. (ECF No.  
2 129.) The government did not seek detention, and Mr. Rojo was not detained. (*Id.*) The Court  
3 set a revocation hearing for May 2, 2024. (*Id.*)

4           3.       Officer McCarroll filed an addendum to the petition on May 1, 2024. (ECF No.  
5 135 (sealed).)

6           4.       Mr. Rojo appeared for the revocation hearing on May 2, 2024. (ECF No. 136.)  
7 He admitted to the violations in the petition, and the violations in the addendum were held in  
8 abeyance. (*Id.*) The Court then continued the hearing to August 20, 2024, to allow Mr. Rojo  
9 time to regain compliance with the conditions of his supervised release. (*See id.*)

10          5.       The Court recently continued the hearing to August 22, 2024. (ECF No. 138.)

11          6.       Counsel for the parties conferred with Officer McCarroll in advance of the  
12 August 22, 2024 revocation hearing. Officer McCarroll informed the parties that Mr. Rojo was  
13 arrested by his state court probation officer on parole violations on May 10, 2024, and was  
14 continuously incarcerated until his release on August 6, 2024. (The violations mirrored those  
15 in this case.) Officer McCarroll proposed continuing the revocation hearing for another four  
16 months to allow Mr. Rojo time to regain compliance with the conditions of his supervised  
17 release. The parties agreed with Officer McCarroll's proposal.

18          7.       The defendant is out of custody and agrees with the need for the continuance.

19          8.       The parties agree to the continuance.

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1 This is the first request for a continuance of the revocation hearing.

2 DATED this 9th day of August, 2024.

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4 RENE L. VALLADARES  
Federal Public Defender

JASON M. FRIERSON  
United States Attorney

5  
6 By /s/ Rick Mula

7 RICK MULA  
8 Assistant Federal Public Defender

By /s/ Justin J. Washburne

JUSTIN J. WASHBURNE  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ERIK ROJO,

7 Defendant.  
8

Case No. 2:15-cr-00180-RFB

**ORDER**

9  
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for  
11 August 22, 2024 at 10:00 a.m., be vacated and continued to December 17, 2024 at 9:15 a.m.

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13 DATED this 12th day of August, 2024.

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16 UNITED STATES DISTRICT JUDGE  
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